

Exhibit A

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS

Date Filed:
Index No.:

===== X

MARTHA JIMENEZ REYES,

SUMMONS

Plaintiff,

Plaintiff designates
Queens County
as place of trial

-against-

TARGET CORPORATION and MIR QUEENS
PLACE ASSOCIATES, LLC,

The basis of the venue is:
Situs of Occurrence

Defendants.

===== X

To the above named defendants:

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer, to, if the complaint is not served with the summons, to serve a notice of appearance, on the plaintiff's attorneys within twenty (20) days after the service of this summons, exclusive of the day of service (or within thirty (30) days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded herein.

Dated: New York, New York
January 28, 2021

The nature of this action is for injuries sustained as a result of the defendants' negligence.
The relief sought is monetary damages.

ELEFTERAKIS, ELEFTERAKIS & PANEK



BY: NICHOLAS ELEFTERAKIS, ESQ.
Attorneys for Plaintiff
80 Pine Street, 38th Floor
New York, N.Y. 10005
(212) 532-1116

Failure to respond, a judgment will be against you, by default and interest from August 27, 2020.

Defendants:

TARGET CORPORATION
1010 Dale Street N
St. Paul, MN 55117-5603

MIR QUEENS PLACE ASSOCIATES, LLC
C/O CORPORATION SERVICE COMPANY
80 State Street
Albany, NY 12207-2543

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS
===== X
MARTHA JIMENEZ REYES,

Date Filed:
Index No.:

Plaintiff,

VERIFIED COMPLAINT

-against-

TARGET CORPORATION and MIR QUEENS
PLACE ASSOCIATES, LLC,

Defendants.

===== X

Plaintiff, by her attorneys, ELEFTERAKIS, ELEFTERAKIS & PANEK, as and for her
Verified Complaint, respectfully alleges, upon information and belief:

1. The plaintiff, **MARTHA JIMENEZ REYES**, at all times herein mentioned was a resident of the State of New York.
2. That at all the times hereinafter alleged, and upon information and belief, Defendant, **TARGET CORPORATION**, was and still is a domestic corporation organized and existing under and by virtue of the laws of the State of New York.
3. That at all the times hereinafter alleged, and upon information and belief, Defendant, **TARGET CORPORATION**, was and still is a foreign corporation authorized to do business under and by virtue of the laws of the State of New York.
4. That at all of the times hereinafter mentioned, and upon information and belief, Defendant, **TARGET CORPORATION**, maintained a principal place of business in the State of New York.
5. That at all of the times hereinafter mentioned, and upon information and belief, Defendant, **TARGET CORPORATION**, conducted and carried on business in the State of New York.
6. That at all of the times hereinafter mentioned, and upon information and belief, Defendant,

TARGET CORPORATION, transacted business within the State of New York.

7. That at all of the times hereinafter mentioned, and upon information and belief, Defendant, **TARGET CORPORATION**, derived substantial revenue from goods used or consumed or services rendered in the State of New York.
8. That at all of the times hereinafter mentioned, and upon information and belief, Defendant, **TARGET CORPORATION**, expected or should have reasonably expected its acts to have consequences in the State of New York.
9. That at all the times hereinafter alleged, and upon information and belief, Defendant, **MIR QUEENS PLACE ASSOCIATES, LLC**, was and still is a domestic corporation organized and existing under and by virtue of the laws of the State of New York.
10. That at all the times hereinafter alleged, and upon information and belief, Defendant, **MIR QUEENS PLACE ASSOCIATES, LLC**, was and still is a foreign corporation authorized to do business under and by virtue of the laws of the State of New York.
11. That at all of the times hereinafter mentioned, and upon information and belief, Defendant, **MIR QUEENS PLACE ASSOCIATES, LLC**, maintained a principal place of business in the State of New York.
12. That at all of the times hereinafter mentioned, and upon information and belief, Defendant, **MIR QUEENS PLACE ASSOCIATES, LLC**, conducted and carried on business in the State of New York.
13. That at all of the times hereinafter mentioned, and upon information and belief, Defendant, **MIR QUEENS PLACE ASSOCIATES, LLC**, transacted business within the State of New York.
14. That at all of the times hereinafter mentioned, and upon information and belief, Defendant,

MIR QUEENS PLACE ASSOCIATES, LLC, derived substantial revenue from goods used or consumed or services rendered in the State of New York.

15. That at all of the times hereinafter mentioned, and upon information and belief, Defendant, **MIR QUEENS PLACE ASSOCIATES, LLC**, expected or should have reasonably expected its acts to have consequences in the State of New York.

16. That at all the times hereinafter alleged, and upon information and belief, the defendant, **TARGET CORPORATION**, owned the premises located at 88-01 Queens Boulevard in the County of Queens, State of New York.

17. That at all the times hereinafter alleged, and upon information and belief, the defendant, **TARGET CORPORATION**, was a lessee of the premises located 88-01 Queens Boulevard in the County of Queens, State of New York.

18. That at all the times hereinafter alleged, and upon information and belief, the defendant, **TARGET CORPORATION**, was a lessor of the premises located 88-01 Queens Boulevard in the County of Queens, State of New York.

19. That at all the times hereinafter alleged, and upon information and belief, the defendant, **TARGET CORPORATION**, managed the premises located at 88-01 Queens Boulevard in the County of Queens, State of New York.

20. That at all the times hereinafter alleged, and upon information and belief, the defendant, **TARGET CORPORATION**, maintained the premises located at 88-01 Queens Boulevard in the County of Queens, State of New York.

21. That at all the times hereinafter alleged, and upon information and belief, the defendant, **TARGET CORPORATION**, controlled the premises located at 88-01 Queens Boulevard in the County of Queens, State of New York.

22. That at all the times hereinafter alleged, and upon information and belief, the defendant, **TARGET CORPORATION**, operated the premises located at 88-01 Queens Boulevard in the County of Queens, State of New York.
23. That at all the times hereinafter alleged, and upon information and belief, the defendant, **TARGET CORPORATION**, supervised the premises located at 88-01 Queens Boulevard in the County of Queens, State of New York.
24. That at all the times hereinafter alleged, and upon information and belief, the defendant, **MIR QUEENS PLACE ASSOCIATES, LLC**, owned the premises located at 88-01 Queens Boulevard in the County of Queens, State of New York.
25. That at all the times hereinafter alleged, and upon information and belief, the defendant, **MIR QUEENS PLACE ASSOCIATES, LLC**, was a lessee of the premises located 88-01 Queens Boulevard in the County of Queens, State of New York.
26. That at all the times hereinafter alleged, and upon information and belief, the defendant, **MIR QUEENS PLACE ASSOCIATES, LLC**, was a lessor of the premises located 88-01 Queens Boulevard in the County of Queens, State of New York.
27. That at all the times hereinafter alleged, and upon information and belief, the defendant, **MIR QUEENS PLACE ASSOCIATES, LLC**, managed the premises located at 88-01 Queens Boulevard in the County of Queens, State of New York.
28. That at all the times hereinafter alleged, and upon information and belief, the defendant, **MIR QUEENS PLACE ASSOCIATES, LLC**, maintained the premises located at 88-01 Queens Boulevard in the County of Queens, State of New York.
29. That at all the times hereinafter alleged, and upon information and belief, the defendant, **MIR QUEENS PLACE ASSOCIATES, LLC**, controlled the premises located at 88-01 Queens

Boulevard in the County of Queens, State of New York.

30. That at all the times hereinafter alleged, and upon information and belief, the defendant, **MIR QUEENS PLACE ASSOCIATES, LLC**, operated the premises located at 88-01 Queens Boulevard in the County of Queens, State of New York.
31. That at all the times hereinafter alleged, and upon information and belief, the defendant, **MIR QUEENS PLACE ASSOCIATES, LLC**, supervised the premises located at 88-01 Queens Boulevard in the County of Queens, State of New York.
32. That on or about August 27, 2020, the plaintiff, **MARTHA JIMENEZ REYES**, was on the aforesaid premises.
33. That on or about August 27, 2020, while the plaintiff, **MARTHA JIMENEZ REYES**, was on the aforesaid premises, she was caused to slip and fall.
34. That the aforesaid accident and the injuries resulting therefrom were due solely and wholly as a result of the careless and negligent manner in that the defendants owned, operated, maintained, managed and controlled the aforesaid premises, without the plaintiff in any way contributing thereto.
35. That the defendants herein were negligent, reckless and careless in that they violated their duties to persons on the aforesaid premises and to this plaintiff in particular, in knowingly permitting, suffering and allowing the aforesaid to be, become and remain in a defective, unsafe and dangerous condition, and were further negligent in failing to take suitable precautions for the safety of persons lawfully on the aforesaid premises.
36. That by reason of the foregoing and the negligence of the defendants, the plaintiff, **MARTHA JIMENEZ REYES**, was severely injured, bruised and wounded, suffered, still suffers and will continue to suffer for some time physical pain and bodily injuries and became sick, sore,


lame and disabled and so remained for a considerable length of time.

37. That by reason of the foregoing, the plaintiff, **MARTHA JIMENEZ REYES**, was compelled to and did necessarily require medical aid and attention, and did necessarily pay and become liable therefore for medicines and upon information and belief, the plaintiff, **MARTHA JIMENEZ REYES**, will necessarily incur similar expenses.
38. That by reason of the foregoing, the plaintiff, **MARTHA JIMENEZ REYES**, has been unable to attend to her usual occupation in the manner required.
39. That one or more of the exceptions of §1602 of the Civil Practice Law and Rules do apply to the within action.
40. That as a result of the foregoing, the plaintiff, **MARTHA JIMENEZ REYES**, sustained damages in an amount which exceeds the monetary jurisdictional limits of any and all lower Courts which would otherwise have jurisdiction herein, in an amount to be determined upon trial of this action.

WHEREFORE, Plaintiff demands the following judgment against the defendants for an amount which exceeds the jurisdictional limits of all other Courts which would otherwise have jurisdiction herein, in an amount to be determined upon trial of this action, together with costs and disbursements of this action, and with interest from the date of the accident. Plaintiff demands a jury trial.

Dated: New York, New York
January 28, 2021

Yours, etc.
ELEFTERAKIS, ELEFTERAKIS & PANEK

By: 

Nicholas Elefterakis, Esq.
Attorneys for Plaintiff
80 Pine Street, 38th Floor
New York, New York 10005
(212)532-1116

ATTORNEY'S VERIFICATION

STATE OF NEW YORK)
)
COUNTY OF NEW YORK) SS:

The undersigned, an attorney admitted to practice in the Courts of the State of New York, and an associate of the law firm of Elefterakis, Elefterakis, & Panek attorneys of record for the claimant herein, affirms:

That he has read the attached SUMMONS AND COMPLAINT and the same is true to his own knowledge, except as to the matters alleged on information and belief, and as to those matters, he believes them to be true to the best of his knowledge.

That affirmant's sources of information are investigation and files maintained in your affirmant's law office.

That this verification is made by your affirmant due to the fact that claimant does not presently reside within the county in which your affirmant maintains his law office, or is presently outside the county in which your affirmant maintains his law office.

The undersigned affirms that the foregoing statements are true, under penalties of perjury.

Dated: New York, New York
January 28, 2021



Nicholas Elefterakis, Esq.

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS**

MARTHA JIMENEZ REYES,

Plaintiff,

-against-

TARGET CORPORATION and MIR QUEENS PLACE ASSOCIATES, LLC,

Defendants.

ELEFTERAKIS, ELEFTERAKIS & PANEK
80 Pine Street, 38th Floor
New York, New York 10005
212.532.1116

Summons and Verified Complaint

STATE OF NEW YORK, COUNTY OF NEW YORK, SS:

Nicholas Elefterakis, the undersigned, an attorney admitted to practice in the Courts of New York State, affirms the following:

I further certify that my signature below acts as a "certification" for the documents attached hereto, in compliance with section 130-1.1-a of the Rules of the Chief Administrator (22 NYCRR).

Dated: New York, New York
January 28, 2021



Nicholas Elefterakis, Esq.

PLEASE TAKE NOTICE

() that the within is a (certified) true copy of a Notice of entered in the Office of the clerk of the within Entry named Court on

() that an Order of which the within is a true copy will be presented for Notice of settlement to the Hon. one of the Judges of the Settlement within named Court, on , at

ELEFTERAKIS, ELEFTERAKIS & PANEK
80 Pine Street, 38th Floor
New York, New York 10005
212.532.1116